

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN THE MATTER OF:) CASE NO. BK04-81489
) CHAPTER 11
)
Furnas County Farms,)
)
Debtor.)

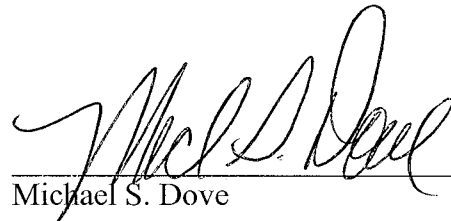
**AFFIDAVIT OF MICHAEL S. DOVE IN SUPPORT OF
EMERGENCY MOTION FOR RECLAMATION**

STATE OF NEBRASKA)
) ss.
COUNTY OF DOUGLAS)

Michael S. Dove, after having been first sworn under oath, does hereby state and allege the following to be true and accurate to the best of his/her personal knowledge and information:

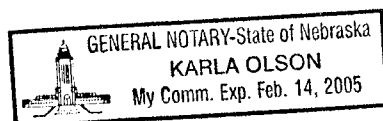
1. I am of lawful age and am personally acquainted with the facts stated herein.
2. I am a partner in the law firm of Gislason & Hunter, LLP, in New Ulm, Minnesota and one of counsel to creditor, Hubbard Feeds Inc.
3. On April 29, 2004, I sent a Reclamation Notice to Debtor in this case. A true and correct copy of the Notice is attached hereto as Exhibit "A" and incorporated herein by reference.

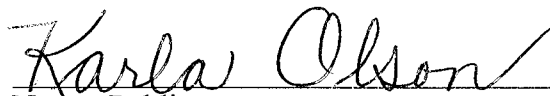
FURTHER AFFIANT SAYETH NOT.



Michael S. Dove

SUBSCRIBED AND SWORN to before me, a notary public in and for said County and State, this 4th day of May, 2004.





Notary Public

GISLASON & HUNTER **FILE COPY**

ATTORNEYS AT LAW

OF COUNSEL
Donald F. Hunter³
James H. Malecki
Ruth Ann Webster

NEW ULM MINNEAPOLIS MANKATO MAPLETON DES MOINES

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Robert M. Halvorson
(1945-1993)
C. Allen Dosland
(Retired)

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Also admitted in:

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³ Illinois

⁴ Admitted only in Virginia

⁵ Admitted only in Iowa

^{*} Civil Trial Specialist

^{**} Real Property Law Specialist
certified by the Minnesota
State Bar Association

[†] Qualified ADR Neutral

April 29, 2004

VIA FACSIMILE AND U.S. MAIL

Mr. Matt T. Cronin
BELIN, LAMSON, McCORMICK,
ZUMBACH, FLYNN
The Financial Center
666 Walnut Street, Suite 2000
Des Moines, Iowa 50309-3989

Mr. Joseph H. Badami
WOODS & AITKEN
301 South 13th Street
Suite 500
Lincoln, NE 68508

Re: Furnas County Farms -- Reclamation Claim of Hubbard Feeds Inc.
Our File No. 18064-001-128

Gentlemen:

Please be advised that Hubbard Feeds Inc. ("Hubbard") hereby makes claim pursuant to Minn. Stat. § 336.2-702 and/or Neb. Rev. Stat. U.C.C. § 2-702, for the right of reclamation against all goods shipped to Furnas County Farms and/or Sand Systems, Inc. (collectively "Furnas") during the applicable reclamation period established by Minn. Stat. § 2-702 and/or Neb. Rev. Stat. U.C.C. § 2-702. These goods include, but are not limited to, feed and nutritional products shipped by Hubbard to Furnas under the following invoice numbers on the dates indicated:

Invoice No.	Ship Date	Invoice Total
80 58507	4-22-04	3,486.95
39 52495	4-22-04	3,012.94
65 45548	4-23-04	574.55
65 45551	4-23-04	2,110.50
65 45453	4-22-04	3,362.85
65 45550	4-23-04	1,363.44
65 45563	4-23-04	1,756.78
65 45564	4-23-04	28,108.48
39 52525	4-23-04	1,215.22
39 52379	4-21-04	3,204.08
39 52380	4-21-04	3,301.41

EXHIBIT

A

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Mr. Matt T. Cronin

April 29, 2004

Invoice No.	Ship Date	Invoice Total
65 45454	4-21-04	3,421.63
65 45409	4-21-04	10,493.12
39 52379	4-21-04	3,204.08
39 52364	4-16-04	3,173.65
80 58507	4-22-04	3,486.95
39 52363	4-16-04	3,785.07
39 52448	4-20-04	3,462.15
39 52384	4-20-04	2,890.27
39 52382	4-22-04	3,477.60
39 52386	4-19-04	2,493.56
39 52385	4-19-04	4,886.47
39 52381	4-22-04	2,603.08
39 52365	4-16-04	2,789.28
39 52362	4-16-04	4,378.92
39 52360	4-16-04	3,151.92
39 52361	4-16-04	5,012.50
39 52366	4-16-04	4,890.34
39 52429	4-20-04	1,044.61
39 52282	4-12-04	1,742.79
39 52243	4-16-04	3,363.98
39 52244	4-16-04	3,363.98
39 52207	4-15-04	2,104.33
39 52205	4-9-04	3,114.14
39 52203	4-9-04	3,203.92
39 52213	4-16-04	3,243.60
39 52212	4-8-04	2,166.00
39 52206	4-15-04	4,223.76
39 52211	4-16-04	5,031.12
39 52324	4-14-04	2,624.50
39 52322	4-14-04	1,268.28
39 52242	4-16-04	3,475.66
39 52245	4-16-04	3,479.53
39 52210	4-16-04	3,325.82
39 52204	4-15-04	3,850.97
80 58483	4-20-04	3,078.68
65 45519	4-21-04	2,331.00
65 45509	4-21-04	4,391.10
39 52380	4-21-04	3,301.41
39 52383	4-22-04	2,890.27
39 52448	4-20-04	3,462.15
39 52384	4-22-04	2,890.27
39 52360	4-16-04	3,151.92

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April 29, 2004

Invoice No.	Ship Date	Invoice Total
39 52361	4-16-04	5,012.50
39 52366	4-16-04	4,890.34
39 52382	4-22-04	3,477.60
39 52429	4-20-04	1,044.61
39 52362	4-16-04	4,378.92
39 52365	4-16-04	2,789.28
39 52381	4-22-04	2,603.08
39 52385	4-19-04	4,886.47
39 52386	4-19-04	2,493.56
39 52363	4-16-04	3,785.07
39 52364	4-16-04	3,173.65
39 52210	4-16-04	3,325.82
39 52242	4-16-04	3,475.66
39 52210	4-16-04	3,325.82
39 52242	4-16-04	3,475.66
39 52245	4-16-04	3,479.53
39 52211	4-16-04	5,031.12
39 52213	4-16-04	3,243.60
39 52243	4-16-04	3,363.98
39 52244	4-16-04	3,363.98
80 58386	4-16-04	3,512.36
65 45440	4-20-04	1,230.62
65 45510	4-21-04	4,289.22
65 45362	4-16-04	14,683.62
80 58616	4-26-04	12,347.72
39 52495	4-22-04	3,012.94
39 52525	4-23-04	1,215.22
65 45534	4-23-04	1,426.80
39 52513	4-29-04	2,542.37
39 52537	4-23-04	4,193.26
39 52538	4-26-04	2,062.96
39 52539	4-26-04	3,142.10
39 52557	4-26-04	685.92
65 45421	4-26-04	3,788.38
39 52509	4-25-04	4,897.85
80 58616	4-26-04	12,347.72
39 52511	4-26-04	4,307.49
65 45611	4-26-04	1,457.48
39 52517	4-27-04	2,842.10
65 45535	4-27-04	10,674.03
65 45617	4-27-04	2,044.80
39 52494	4-27-04	5,816.45

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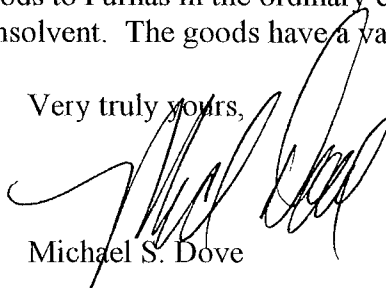
Mr. Matt T. Cronin
April 29, 2004

Invoice No.	Ship Date	Invoice Total
39 52496	4-27-04	4,480.96
39 52510	4-27-04	4,178.92
39 52512	4-27-04	3,129.15
39 52515	4-27-04	2,745.00
39 52514	4-28-04	3,168.14
39 52597	4-28-04	992.06
65 45653	4-28-04	112.56
65 45422	4-28-04	12,432.38
65 45660	4-28-04	1,384.44
39 52615	4-28-04	2,991.87
65 45536	4-28-04	10,431.20
39 52511	4-26-04	4,307.49
39 52509	4-26-04	4,897.85
39 52557	4-26-04	685.92
39 52537	4-23-04	4,193.26
39 52513	4-29-04	2,542.37
39 52538	4-26-04	2,062.96
39 52539	4-26-04	3,142.10
39 52617	4-29-04	2,971.95
39 52516	4-29-04	3,160.88
80 58671	4-29-04	3,445.83
39 52618	4-28-04	2,439.84
Total:		\$448,260.37

Demand is hereby made for the return of the goods identified above. The invoices are available for your review, upon your request.

Hubbard sold the goods to Furnas in the ordinary course of Furnas' business, which Furnas has received while insolvent. The goods have a value of \$448,260.37.

Very truly yours,



Michael S. Dove

MSD:kkg

cc: Mr. Vince Baack (via facsimile)
Mr. Trent Bausch (via facsimile)